

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

PETITION TO INTERVENE

petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Keith Kueny
Company: The Community Action Partnership of Oregon
Street Address: 350 Mission SE
City, State, Zip: Salem, Orgeon, 97203
Email Address: keith@caporegon.org
Telephone: 5039919327

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Janet Merrell
Company: CAPO
Street Address: 350 Mission SE
City, State, Zip: Salem, Oregon, 97203
Email Address: janet@caporegon.org
Telephone: 5038309969

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

Community Action Partnership of Oregon (CAPO) is the State Association for Oregon's Community Action network of 17 Community Action Agencies and Oregon Human Development Corporation, a statewide agency serving farmworkers.

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

CAPO delivers federal, state, utility, and local energy assistance programs. These programs make up a portion of the essential services that we provide low-income Oregonians, which also includes but is not limited to housing, food, and transportation services. Our agencies package low-income programs to lift low-income clients from poverty to create self-sufficiency. This model relies heavily on energy assistance participation. Each year, the agencies serve over 100,000 Oregonians, many of these clients arrive at an agency seeking energy assistance. The Oregon low-income Gas Assistance program, otherwise known as OLGA, is an energy assistance program delivered by Community Action agencies and funded by NWN. A rate increase will directly impact the agencies in two primary ways: 1) An increase will increase agency budgets - the funding is based off of a percentage charged to residential ratepayers 2) However, rising bills will increase energy assistance payments - reducing the amount of clients that can be served. The rate increase directly impacts Community Action budget and operations.

Further, NWN has long neglected the energy assistance programs. Company policies disadvantage community of color and migrant workers, requiring burdensome documentation requirements.

CAPO seeks to administer the low-income programs. Commissions across the country have removed low-income programs from utility administration because there is an inherent conflict in utility administration. In Oregon, policy-makers decided that there was a conflict for utilities to deliver energy efficiency programs, then decided to move those programs to the Energy Trust of Oregon. To the detriment to low-income Oregonians, the programs were left at the utility. CAPO are the low-income experts and should administer low-income programs, a request of the ETO model and the CEP model. Those organizations were awarded

programs from this commission. CAPO seeks the same treatment. NWN has long abandoned principle in delivering the programs to serve their own interest. Now, in a pandemic, they continue to ignore the low-income experts as we beg for changes to help those struggling through this difficult time. It's long overdue for the commission to move the program administration of these programs to where they belong: with low-income experts.

5. The issues the Petitioner intends to raise at the proceeding are:

- Administration of the low-income assistance and weatherization programs
- An increase in funding for low-income programs in parity with electric programs
- Updated low-income requirements
- What is the necessity of raising rates during the beginning of a recession

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

CAPO has deep understanding of low-income energy assistance and low-income energy efficiency programs.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Keith Kueny

Petitioner or Petitioner's Representative

5-13-20

Date Signed

Certificate Of Completion

Envelope Id: 1F5E1FBF09A44E2289EB802ACC3128A6	Status: Completed
Subject: Final - Commission Petition	
Source Envelope:	
Document Pages: 3	Signatures: 1
Certificate Pages: 1	Initials: 0
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Disabled	Keith Kueny
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	keithkueny@gmail.com
	IP Address: 97.120.116.193

Record Tracking

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5/13/2020 9:29:46 AM	keithkueny@gmail.com	

Signer Events

Signature	Timestamp
Keith Kueny keithkueny@gmail.com Security Level: Email, Account Authentication (None)	Sent: 5/13/2020 9:29:47 AM Viewed: 5/13/2020 9:29:52 AM Signed: 5/13/2020 9:30:19 AM Freeform Signing
Signature Adoption: Pre-selected Style Using IP Address: 97.120.116.193	

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events

Signature	Timestamp
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Editor Delivery Events

Status	Timestamp
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Agent Delivery Events

Status	Timestamp
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Intermediary Delivery Events

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Certified Delivery Events

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Carbon Copy Events

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Witness Events

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Notary Events

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Envelope Summary Events

Status	Timestamps
Envelope Sent	5/13/2020 9:29:47 AM
Certified Delivered	5/13/2020 9:29:52 AM
Signing Complete	5/13/2020 9:30:19 AM
Completed	5/13/2020 9:30:19 AM

Payment Events

Status	Timestamps
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Community Action Partnership of Oregon Board of Directors Contact List

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<p>Kemp Shuey Executive Director</p>	<p>Community Action (CAO) 1001 SW Baseline Street Hillsboro, OR 97123 (Washington County)</p>	<p>(503) 693-3221 Office (503) 302-2382 Mobile (503) 648-4175 Fax KShuey@caowash.org</p>
<p>Paula Hall Chief Executive Officer</p>	<p>Community Action Program of East Central Oregon (CAPECO) 721 SE 3rd Street, Suite D Pendleton, OR 97801 (Gilliam, Morrow, Umatilla & Wheeler Counties)</p>	<p>(800) 752-1139 Office (541) 278-5671 Direct (541) 276-7541 Fax phall@CAPECO-WORKS.org</p>
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Alexandra Hendgen Secretary/Treasurer Executive Director	Yamhill Community Action Partnership (YCAP) 1317 NE Dustin Court/ P.O. Box 621 McMinnville, OR 97128 (Yamhill County)	(503) 883-4172 Direct (503) 621-2022 Cell (503) 472-5555 Fax alexandrah@yamhillcap.org